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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
v. :  
NICHOLAS MALINDRETOS : Honorable Edward S. Kiel  
: Mag. No. 23-15018

I, Joshua Bouchard, the undersigned complainant being duly sworn,  
state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the Federal Bureau of  
Investigation, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

  
\_\_\_\_\_  
Joshua Bouchard, Special Agent  
Federal Bureau of Investigation

Special Agent Bouchard attested to this Complaint  
by telephone pursuant to F.R.C.P. 4.1

February 1, 2023  
Date

at District of New Jersey  
County and State

HONORABLE EDWARD S. KIEL  
UNITED STATES MAGISTRATE JUDGE

  
\_\_\_\_\_  
Edward S. Kiel \* signed with permission  
Signature of Judicial Officer received at 1:50pm on  
3/1/23.

**ATTACHMENT A**

**Count One**

(Attempted Use of Fire to Damage and Destroy a Building Used in Interstate Commerce)

On or about January 29, 2023, in the District of New Jersey and elsewhere, defendant,

**NICHOLAS MALINDRETOS,**

maliciously attempted to damage and destroy by fire a building used in, and the activities of which affect, interstate and foreign commerce, to wit, Temple Ner Tamid Jewish Congregation in Bloomfield, New Jersey.

In violation of Title 18, United States Code, Section 844(i).

**ATTACHMENT B**

I, Special Agent Joshua Bouchard, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about January 29, 2023, at approximately 03:19 a.m., according to the surveillance video (the "Video") at the Temple Ner Tamid Jewish Congregation located in Bloomfield, New Jersey (the "Temple"), Defendant NICHOLAS MALINDRETO (the "Defendant") approached the Temple. He was wearing a black ski mask covering his entire face but for his eyes (the "Mask"), a black or dark gray hooded sweatshirt with a white emblem of what appeared to be a skull and cross bones (the "Sweatshirt"), black pants, dark shoes, and white cloth gloves (the "Gloves").

2. The Video showed the Defendant walking up to the front entrance area of the Temple, pausing, and then igniting a wick on the top of a bottle. The Defendant threw the bottle at the front glass doors of the Temple. The Defendant then fled on foot down the driveway.

3. According to a license plate reading device ("LPR") located at Watchung Avenue and Broad Street in Bloomfield, New Jersey (approximately 0.3 miles away from the Temple), a vehicle with the license plate "Y24KCS" (the "Vehicle") passed that intersection at approximately 3:04 a.m. on January 29, 2023 (approximately 15 minutes before the Defendant threw the ignited bottle at the Temple). The same LPR detected that a black Volkswagen sedan with the license plate "Y24KCS" passed that intersection at approximately 3:29 a.m. on January 29, 2023 (approximately 10 minutes after the Defendant threw the ignited bottle at the Temple).

4. On or about January 31, 2023, law enforcement located the Vehicle in Clifton, New Jersey. Several objects were plainly observable inside the Vehicle through the window of the Vehicle. Specifically, on the front seat was a hooded sweatshirt (consistent with the Sweatshirt observed in the Video), white cloth items that appeared to be made of material similar to the Gloves that the Defendant was wearing in the Video, and bottles of unidentified liquids.

5. Video cameras in the area where the Vehicle was parked captured the Vehicle parking and a male individual with the same physical

characteristics as the Defendant exiting the Vehicle and entering a nearby two-story building (the "Building"). Law enforcement spoke with the owner of the Building who said that he/she allowed the Defendant to live in the basement of the Building.

6. Law enforcement then obtained a search warrant for the Vehicle, which warrant was executed on or about February 1, 2023. Located in the Vehicle was a black sweatshirt (with markings consistent with the Sweatshirt observed in the Video), white cloth gloves (consistent with the Gloves observed in the Video), and a mask (consistent with the Mask observed in the Video).

7. The Temple was used in, and engaged in activities which effect, interstate commerce.